

RI/FS DOCUMENT / MEETING SUMMARY
Updated through January 24, 2017
Leviathan Mine Site
Alpine County, California

Date	Date Submitted by Atlantic Richfield	Date Submitted by EPA	EPA Requested Due Date	Atlantic Richfield Estimated Timeframe for Submittal	Work Plan / Document	Amendment / Addendum / Revision No	Author	Recipient	Item	Atlantic Richfield Status	US EPA Status	US EPA Comment	Atlantic Richfield Comment
Administrative Order													
06/23/08					UAC	NA	US EPA	Atlantic Richfield	Administrative Order for RI/FS, Leviathan Mine, Alpine County, California; US EPA Region IX, CERCLA Docket No. 2008-18	Received			
Data Quality Objectives													
08/14/15	08/14/14		08/10/15		On-Property / Off-Property / Reference	NA	Atlantic Richfield	US EPA	Response to US EPA and LRWOGB Comments on the Revised Data Quality Objectives for the On-Property and Reference Study Areas and Updated Cross-Reference Matrix Table	Submitted			
07/10/15					On-Property / Off-Property / Reference	NA	US EPA	Atlantic Richfield	EPA Comments on Revised Data Quality Objectives for the On-Property and Reference Study Areas and Updated Cross-Reference Matrix Table	Received			Also requested response to US EPA's 12/26/12 and 11/14/14 letters
02/28/15					On-Property / Off-Property / Reference	NA	Atlantic Richfield	US EPA	Revised Data Quality Objectives for the On-Property and Reference Area Study Areas and Updated Cross-Reference Matrix Table	Submitted			Response to US EPA 11/14/2014 comments
02/28/15					Reference	NA	Atlantic Richfield	US EPA	Revised Reference Area DQOs	Submitted			Submitted with Draft Final Reference Area FRI Work Plan
11/14/14					On-Property / Off-Property / Reference	NA	US EPA	Atlantic Richfield	Comments on Technical Memorandum: Current Data Quality Objectives and Leviathan Mine FRI Work Plan Cross-Reference Matrix	Received			
09/05/14					On-Property / Off-Property / Reference	NA	Atlantic Richfield	US EPA	Technical Memorandum: Compilation of Data Quality Objectives and Cross-Reference Matrix	Submitted			
08/28/13					Off-Property	NA	Atlantic Richfield	US EPA	Revised Off-Property DQOs	Submitted			Submitted with Revised Off-Property FRI Work Plan Addendum No. 2
12/26/12					Off-Property	NA	US EPA	Atlantic Richfield	Review and Comments on Draft DQOs Submittal dated November 19, 2012; Direction to Prepare and Submit Revised Off-Property FRI Work Plan	Received			
11/19/12					Off-Property / Reference	NA	Atlantic Richfield	US EPA	Revised DQO Summary Tables for On-Property and Reference Study Areas	Submitted			
09/05/12						NA	Atlantic Richfield	US EPA	Technical Workshop - DQOs	Conducted			September 5 and 6, 2012
05/13/10					DQO Report	NA	US EPA	Atlantic Richfield	Programmatic DQOs (transmitted with 5/13/10 approval of FWP)	Received			
04/23/09					DQO Report	NA	US EPA	Atlantic Richfield	Approval with Comments for Leviathan Mine DQOs Report Submitted October 2008, and Direction to Prepare RI/FS Work Plan Pursuant to Administrative Order for RI/FS	Received			
10/21/08					DQO Report	NA	Atlantic Richfield	US EPA	Draft Data Quality Objectives Report: RI/FS	Submitted			
Program Work Plan													
11/21/15		11/23/15			Program	QAPP	US EPA	Atlantic Richfield	EPA Comments on Atlantic Richfield Company (ARC) Final Revised RI/FS Quality Assurance Project Plan (QAPP), Revision 1 for the Leviathan Mine Site in Alpine County, California, dated June 17, 2015, Updated Project Database dated June 30, 2015, and the DQOs response from ARC dated August 14, 2015.	Received; RLC and revised document in progress			EPA conditionally approved the QAPP dated June 17, 2016, provided EPA comments are addressed. A list of the comments remain unaddressed as outlined above. EPA's conditional approval remains in place. Within 60 days of by January 21, 2017, EPA directs ARC to provide a line-by-line response to these comments and submit a revised final Updated Quality Assurance Project Plan (QAPP) and Data Management Plan that incorporates the Database, the DQOs and the Conceptual Site Model incorporating these changes.
11/01/16	11/01/16				Program	QAPP	Atlantic Richfield	US EPA	Response to EPA comments on PE Samples	Submitted			Email; discussed with US EPA via telephone on 11/8/16
10/24/16		10/24/16			Program	QAPP	US EPA	Atlantic Richfield	EPA comments on PE Samples	Received			Email
06/17/16	06/17/16		05/27/16		Program	QAPP	Atlantic Richfield	US EPA	Remedial Investigation/Feasibility Study Quality Assurance Project Plan, Revision No. 1 [Final]	Submitted	US EPA comments delivered 1/21/16		Includes line-by-line response to 04/28/16 comments. Includes complete set of DQOs as of submittal date.

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	04/28/15		04/29/16		Program	QAPP	US EPA	Atlantic Richfield	EPA Comments on Atlantic Richfield RIFS Quality Assurance Project Plan (QAPP); Revision No. 1 for the Leviathan Mine Site in Alpine County, California; dated March 9, 2016	Received			Conditional approval of RIFS Quality Assurance Project Plan, Revision No. 1. Within 30 days, requests line by line RTC and revised Final Updated Quality Assurance Project Plan and Data Management Plan along with updated schedule that incorporates the data usability process US EPA has outlined.
	03/09/15	03/09/16		03/09/16	Program	QAPP	Atlantic Richfield	US EPA	RIFS Quality Assurance Project Plan, Revision No. 1	Submitted			Includes line-by-line response to 02/09/16 comments
	02/09/16		02/09/16		Program	QAPP	US EPA	Atlantic Richfield	EPA Comments on Atlantic Richfield RIFS Quality Assurance Project Plan (QAPP); Revision 1 for the Leviathan Mine Site in Alpine County, California	Received			
	02/05/16	02/05/16			Program	QAPP	Atlantic Richfield	US EPA	Draft Annotated Revised QAPP TOC and Crosswalk	Submitted			Email; attached files are dated 01/27/16
	01/14/15		01/14/16		Program	QAPP	US EPA	Atlantic Richfield	EPA initial comments on the QAPP and Data Quality Discussions	Received			Email
	12/14/15	12/14/15			Program	QAPP	Atlantic Richfield	US EPA	Quality Assurance Project Plan, Revision 1	Submitted	US EPA preliminary comments delivered 01/14/16		Requested by US EPA in 04/01/15 technical meeting to discuss data usability
	05/13/10				Program	PWP	US EPA	Atlantic Richfield	Approval with Comments and Direction to Implement 2009 Draft Program Work Plan and Addendum for RIFS	Received			
	02/26/10				Program	PWP	US EPA	Atlantic Richfield	Schedule for US EPA Comments on 2009 Draft Program Work Plan and Addendum for RIFS	Received			
	11/10/09				Program	Addendum 1	Atlantic Richfield	US EPA	Addendum No. 1 to 2009 Draft Program Work Plan for RIFS	Submitted			
	07/10/09				Program	PWP	Atlantic Richfield	US EPA	Draft RIFS Program Work Plan	Submitted			
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	8/24/2016		8/24/2016		On-Property, Off-Property, and Reference	Fish TSAP	Atlantic Richfield	US EPA	Email FW: NED OK WITH THIS?EPA Conditional Approval on the Fish Sampling TSAP	Submitted			Concurs with ARC's proposed sampling (8/23/16 email), but notes that timing of sampling intended to ensure comparable results with previous event in October because fish feeding behaviors change with season.
	8/23/2016	8/23/2016			On-Property, Off-Property, and Reference	Fish TSAP	Atlantic Richfield	US EPA	Email RE: EPA Conditional Approval on the Fish Sampling TSAP	Submitted			Responds to US EPA comments on sampling schedule. Response to reporting schedule submitted in a separate letter on 9/9/16.
	08/12/16		08/12/16		On-Property, Off-Property, and Reference	Fish TSAP	US EPA	Atlantic Richfield	EPA Comments ARC Response to Comments (RTC) of Draft On-Property, Off-Property Area, and Reference Area FRI Work Plans - Task Sampling and Analysis Plan for Fish Investigation (Draft Final), Leviathan Mine Site, Alpine County, California, Dated June 13, 2016 [see]	Received			Conditional approval provided comments are addressed and incorporated as described. Indicates work outlined in TSAP should be completed during the 2016 field season. Requests that sampling be conducted in late September. Requests timely notification of anticipated completion of work. Requests written report within 90 days of completion of field work.
	06/13/16	06/13/16		06/13/16	On-Property, Off-Property, and Reference	Fish TSAP	Atlantic Richfield	US EPA	On-Property, Off-Property Area, and Reference Area FRI Work Plans - Task Sampling and Analysis Plan for Fish Investigations [Draft Final]	Submitted	US EPA comments delivered 08/12/16		Before proceeding with specimen collection, Atlantic Richfield Company is requesting (in Appendix D, Section 4.0) that the U.S. EPA provide written confirmation that the work described in this TSAP is exempt from state and federal permit requirements under CERCLA § 121(e) and that no further consultation with the U.S. Fish and Wildlife Service is required under the Endangered Species Act.
	05/13/16		05/13/16		On-Property, Off-Property, and Reference	Fish TSAP	US EPA	Atlantic Richfield	EPA comments on Draft On-Property, Off-Property, and Reference Area Focused Remedial Investigation Work Plans--Task Sampling and Analysis Plan for Fish Investigation, Leviathan Mine Site, Alpine County, California, dated February 9, 2016	Received			Requests line-by-line RTC and revised and updated SAP within 30 days.
	02/05/16	02/05/16		11/13/15 01/29/16 01/29/16 per 11/13/16 extension request 02/03/16 per 12/7/16 email	On-Property, Off-Property, and Reference	Fish TSAP	Atlantic Richfield	US EPA	On-Property, Off-Property, and Reference Area FRI Work Plans - Task Sampling and Analysis Plan for Fish Surveys and Sampling [Draft]	Submitted	US EPA comments delivered 05/13/16		11/13/16 letter to request extension to 01/29/16. 01/27/16 email to inform need additional week to 02/05/16.
	12/08/15		12/08/15		On-Property, Off-Property, and Reference	Fish TSAP	Atlantic Richfield	US EPA	US EPA Response to Request for Schedule Extension for Fish Sampling Work Plan On-Property, Off-Property, and Reference Area Focused Remedial Investigation Work Plans	Received; responded via email on 12/10/15			US EPA indicates not opposed as long as does not impact RIFS schedule and its RI and Risk Assessment. Atlantic Richfield responded via email on 12/10/15 explaining rationale for timing of field activities and submittal date for work plan. Further discussed during 12/10/15 quarterly technical meeting.

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	11/13/15	11/13/15				On-Property, Off-Property, and Reference	Fish TSAP	Atlantic Richfield	US EPA	Request for Schedule Extension for Fish Sampling Work Plan On-Property, Off-Property, and Reference Area Focused Remedial Investigation Work Plans	Submitted	US EPA comments delivered 12/08/15		Requests extension to 1/29/16, need additional time to review and evaluate previous investigation results
	10/13/15		10/13/15	11/13/15	Requested extension to 01/29/16	On-Property, Off-Property, and Reference	Fish TSAP	US EPA	Atlantic Richfield	Request for Fish Sampling Work Plan On-Property, Off-Property, and Reference Area Focused Remedial Investigation Work Plans	Received			Requested in US EPA's 10/13/15 letter. Transmitting comments on the Final BI-HRA Work Plan
	09/09/15	09/09/16				On-Property, Off-Property, and Reference	Plant/Soil TSAP	Atlantic Richfield	US EPA	Supplement Plant Data Collection	Submitted			Informed US EPA of additional plant data collection (mass and total/inorganic arsenic for three leafy greens) to be performed in late 2016.
	04/08/15	04/02/16		04/09/16		On-Property, Off-Property, and Reference	Plant/Soil TSAP	Atlantic Richfield	US EPA	On-Property, Off-Property Area, and Reference Area FRI Work Plans -- Plant and Habitat-Related Soil Investigations (Final)	Submitted	Pending US EPA review		Submitted with line-by-line response to 03/09/16 comments
	03/09/15		03/09/16			On-Property, Off-Property, and Reference	Plant/Soil TSAP	US EPA	Atlantic Richfield	EPA comments on the Progress Report and Response to Comments on the Draft Final On-Property, Off-Property and Reference Area Focused Remedial Investigation (FRI) Work Plan -- Plant and Habitat-Related Soil Investigations, Leviathan Mine Site, Alpine County, California, dated November 16, 2015	Received			Requests line-by-line RTC and revised and updated SAP by April 9, 2016. Directs works to proceed and be completed within 2016 field sampling season
	11/16/15	11/16/15		11/16/15		On-Property, Off-Property, and Reference	Plant/Soil TSAP	Atlantic Richfield	US EPA	Progress Report and Response to Comments on the Draft Final On-Property, Off-Property and Reference Area Focused Remedial Investigation Work Plan -- Plant and Habitat-Related Soil Investigations	Submitted			
	10/16/15		10/16/15		RTC by 11/16/15	On-Property, Off-Property, and Reference	Plant/Soil TSAP	US EPA	Atlantic Richfield	EPA Comments on the June 19, 2015 Draft Final On-Property, Off-Property and Reference Area FRI Work Plan -- Plant and Habitat-Related Soil Investigations	Received			RTC and associated revisions are accepted. Defers to the approved work plan and previous EPA comments and provides additional comment, makes several requests.
	06/19/15	06/19/15				On-Property, Off-Property, and Reference	Plant/Soil TSAP	Atlantic Richfield	US EPA	Draft Final On-Property, Off-Property Area, and Reference Area FRI Work Plans -- Plant and Habitat-Related Soil Investigations	Submitted			
	06/02/15					On-Property, Off-Property, and Reference	Plant/Soil TSAP	Atlantic Richfield	US Forest Service	Notification of Plant Collection Activities Within the Humboldt-Toiyabe National Forest	Submitted			
	05/18/15				US EPA requests written response within 30 days or by 6/19/15	On-Property & Off-Property	Plant/Soil TSAP	US EPA	Atlantic Richfield	EPA Comments on two separate submittals: the March 20, 2015 Technical Memorandum, Habitat Surveys, Plant Species, and Study Design for Plant Sampling, and the April 7, 2015 On-Property FRI Work Plan and Off-Property Area FRI Work Plan Plant and Habitat-Related Soil Investigations	Received			
	04/07/15					On-Property & Off-Property	Plant/Soil TSAP	Atlantic Richfield	US EPA	On-Property FRI work plan and On-Property Area FRI Work Plan - Plant and Habitat-Related Soil Investigations	Submitted			
	02/09/15		02/08/16			On-Property	Optimization	US EPA	Atlantic Richfield	EPA comments on the Atlantic Richfield Response to US EPA September 11, 2015 Comments on Optimization of Select On-Property Monitoring, dated October 12, 2015	Received			Concurrence
	10/12/15	10/12/15		10/12/15		On-Property	Optimization	Atlantic Richfield	US EPA	Response to U.S. EPA September 11, 2015 Comments on Optimization of Select Monitoring Programs	Submitted			
	09/11/15		09/11/15		RTC by 10/12/15	On-Property	Optimization	US EPA	Atlantic Richfield	EPA comments on the Atlantic Richfield Response to U.S. EPA Comments on Optimization of Select On-Property Monitoring, dated April 24, 2015	Received			
	04/24/15					On-Property	Optimization	Atlantic Richfield	US EPA	Response to U.S. EPA Comments on Optimization of Select On-Property Monitoring Programs	Submitted			
	03/26/15					On-Property	Optimization	US EPA	Atlantic Richfield	EPA comments on Proposed Optimization of Select On-Property Monitoring Programs, letter dated February 4, 2015	Received			
	02/04/15					On-Property	Optimization	Atlantic Richfield	US EPA	Optimization of Select On-Property Monitoring Programs (in 2014)	Submitted			
	06/17/14					On-Property	Optimization	Atlantic Richfield	US EPA	Technical Meeting: Optimization of Monitoring Programs and 2014 Field Priorities	Conducted			
	10/13/15					On-Property	Drilling	Atlantic Richfield	US EPA	RE: EPA Comments to ARC request for US EPA to reconsider Letter of August 14, 2015 Requesting Continuation of R/IFS Drilling Program in 2015	Received			E-mail response to 10/06/15 letter, concurs that should proceed with both reference boreholes and complete LOC-34 as weather permits and drilling equipment is available
	10/06/15					On-Property	Drilling	Atlantic Richfield	US EPA	Response to US EPA Email Correspondence of September 29, 2015 Regarding Rationale for Proposed 2015 Modifications to R/IFS Drilling Program	Submitted			US EPA responded by e-mail on 10/13/15
	09/29/15					On-Property	Drilling	US EPA	Atlantic Richfield	EPA Comments to ARC Request for U.S. EPA to Reconsider Letter of August 14, 2015 Requesting Continuation of R/IFS Drilling Program in 2015	Received			E-mail

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	09/18/15				On-Property	Drilling	Atlantic Richfield	US EPA	Response to US EPA Letter of August 14, 2015 Regarding Rationale for Proposed 2015 Modifications to R/IFS Drilling Program	Submitted			E-mail
	09/08/15				On-Property	Drilling	US EPA	Atlantic Richfield	EPA response to Atlantic Richfield's 8/28/15 email responding to Response to US EPA comments on Rationale for Proposed 2015 Modifications to R/IFS Drilling Program	Received			E-mail
	08/28/15		08/28/15		On-Property	Drilling	Atlantic Richfield	U.S. EPA	Response to US EPA comments on Rationale for Proposed 2015 Modifications to R/IFS Drilling Program	Submitted			E-mail
	08/14/15				On-Property	Drilling	US EPA	Atlantic Richfield	EPA Comments on Rationale for Proposed Modifications to R/IFS Drilling Program	Received			
	06/26/15				On-Property	Drilling	Atlantic Richfield	US EPA	Rationale for Proposed 2015 Modifications to R/IFS Drilling Program	Submitted			
	06/12/15				On-Property	Drilling	US EPA	Atlantic Richfield	Leviathan Mine - Drilling Program - EPA comments and request for additional information (email)	Received			E-mail
	06/09/15				On-Property	Drilling	Atlantic Richfield	US EPA	Leviathan Mine - Drilling Program (email)	Submitted			Transmits table and figure showing proposed drilling locations for 2015.
	12/18/14				On-Property	Drilling	Atlantic Richfield	US EPA	2014 Drilling Postponement Rationale	Submitted	No pending action: ARC requested response to June 17, 2014 discussion and December 18, 2014 from ARC	This ongoing discussion culminated in an August 14, 2015 email from Lynda to Tony agreeing that Pit wells are not currently needed and requesting that ARC go forward with two wells along the fault north of the Pit that ARC had requested to remove from the drilling program.	E-mail
	08/01/13				On-Property	Drilling	Atlantic Richfield	US EPA	Technical Meeting: 2013 R/IFS Drilling Program	Conducted			
	12/05/17		12/05/17	None	On-Property	Amendment 12	US EPA	Atlantic Richfield	Email FW: Leviathan Mine - Information Regarding Revegetation Treatability Study Baseline Soil Sampling in ACSA	Received in progress		Please provide additional details (i.e. map relative to other hydrocarbon findings, and mining era site features) to support how ARC concluded that these observations do not need follow-up investigation.	
	06/01/16	06/01/16		05/28/16	On-Property	Amendment 12	Atlantic Richfield	US EPA	On-Property FRI Work Plan Amendment No. 12 - TSAP for Hydrocarbon Investigation (Draft Final)	Submitted	Pending US EPA review		Submitted with line-by-line responses to 04/29/16 comments.
	04/29/16		04/29/16		On-Property	Amendment 12	US EPA	Atlantic Richfield	EPA Comments on Atlantic Richfield Draft On-Property Focused Remedial Investigation Work Plan Amendment No. 12 - Task Sampling and Analysis Plan for Hydrocarbon Investigation, Leviathan Mine Site, Alpine County, California, dated February 26, 2016	Received			Requests line-by-line RTC and revised SAP by 05/29/16. Directs works to proceed and be completed within 2016 field sampling season.
	02/26/16	02/26/16		01/30/16	On-Property	Amendment 12	Atlantic Richfield	US EPA	On-Property FRI Work Plan Amendment No. 12 - TSAP for Hydrocarbon Investigation	Submitted			Atlantic Richfield agreed to prepare work plan during a 10/14/14 telephone call.
	06/14/16		06/14/16		On-Property	Amendment 11	US EPA	Atlantic Richfield	Email FW: EPA Approval Amendment No. 11 Acid Ponding Near Leviathan Creek TSAP	Received, need to provide DFX information			Requests information on the four drive-point piezometers that US EPA requested to be installed along the west bank of Leviathan Creek. No date date provided.
	05/08/16	05/06/16		Not requested	On-Property	Amendment 11	Atlantic Richfield	US EPA	On-Property FRI Work Plan Amendment No. 11 - TSAP for Surface Water/Groundwater Interaction Investigation near Acidic Pond and Leviathan Creek (Final)	Submitted			No revision requested; however, submitted as final to include additional requested drive-point piezometer pairs and make correction regarding installation of data loggers/transducers.
	02/26/16		02/26/16		On-Property	Amendment 11	US EPA	Atlantic Richfield	Draft Final Amendment No. 11 - TSAP for Investigation of Ponding Near Leviathan Creek, Leviathan Mine Site, Alpine County, California, dated February 22, 2015 [sic]	Received			Approves Atlantic Richfield to proceed with the work as outlined and directs installation of drive-point piezometers pairs at four more locations.
	02/22/16	02/22/16			On-Property	Amendment 11	Atlantic Richfield	US EPA	On-Property FRI Work Plan Amendment No. 11 - TSAP for Surface Water/Groundwater Interaction Investigation near Acidic Pond and Leviathan Creek (Draft Final)	Submitted			Submitted with line-by-line RTC to 01/22/16 comments.
	01/22/16		01/22/16		On-Property	Amendment 11	US EPA	Atlantic Richfield	EPA Comments on Amendment No. 11 - TSAP for Investigation of Ponding Near Leviathan Creek, Leviathan Mine Site, Alpine County, California, dated September 20, 2015	Received			US EPA requests line-by-line response to comments and revised TSAP by 02/19/16.
	09/20/15	09/20/15			On-Property	Amendment 11	Atlantic Richfield	US EPA	On-Property FRI Work Plan Amendment No. 11 - TSAP for Investigation of Ponding Near Leviathan Creek	Submitted	Comments delivered 01/22/16		
	05/18/15		05/18/16		On-Property	Amendment 10	US EPA	Atlantic Richfield	EPA Approval of Atlantic Richfield's [sic] Company's On-Property FRI Work Plan Amendment No. 10, Revision 3 Final, dated September 30, 2015	Received			Approves the Revision 3 workplan with additional comments. Atlantic Richfield to provide an updated schedule and any final workplan modifications for the 2016 field season based the preliminary evaluation of stream sediment and floodplain soil sampling results. Indicates comments on the 04/15/16 submission will be provided under separate cover.

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12/21/15		12/21/15		On-Property	Amendment 10	US EPA	Atlantic Richfield & Others	2015/2016 El Niño Contingency Plan [Final]	Received			
12/02/15	12/02/15			On-Property	Amendment 10	Atlantic Richfield	US EPA	Suggested edits to Final Draft El Niño Contingency Plan	Submitted			Discussed during 12/10/15 quarterly technical meeting. Greg Reiler and Bob Starr discussed criteria for changes in water quality after the meeting.
11/30/15		11/30/15		On-Property	Amendment 10	US EPA	Atlantic Richfield & Others	El Niño Contingency Plan [Final Draft]	Received			
11/23/15	11/23/15		11/23/15	On-Property	Amendment 10	Atlantic Richfield	US EPA	Response to US EPA comments on El Niño Contingency Plan provided by email on 11/23/15	Submitted	Comments delivered via email on 11/30/15		
11/17/15	11/17/15			On-Property	Amendment 10	Atlantic Richfield	US EPA	Comments on U.S. EPA's El Niño Contingency Plan	Submitted	Responded via email on 11/23/15		
10/20/15				On-Property	Amendment 10	US EPA	Atlantic Richfield	EPA Comments on Field Memorandum for Phase 2 Characterization of Beaver Dam Mud, On-Property Reach of Leviathan Creek, Dated October 13, 2015	Received			Approved, directs ARC to ensure sampling completed during 2015 season.
10/19/15				On-Property	Amendment 10	Atlantic Richfield	US EPA	Winter Monitoring Plan for Beaver Dam/Pond Complex in the On-Property Reach of Leviathan Creek	Submitted			
10/13/15				On-Property	Amendment 10	Atlantic Richfield	US EPA	Field Memorandum for Phase 2 Characterization of Beaver Dam Mud, On-Property Reach of Leviathan Creek	Submitted			